

**AFFIDAVIT IN SUPPORT OF AN**  
**APPLICATION FOR A CRIMINAL COMPLAINT**

I, Juan E. Batista Aybar, being first duly sworn, do here by depose and state that:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a United States Customs and Border Protection Enforcement Officer with the Department of Homeland Security, assigned to investigate Immigration Law violations and Criminal Laws of the United States at the Luis Muñoz Marín International Airport, Carolina, Puerto Rico.

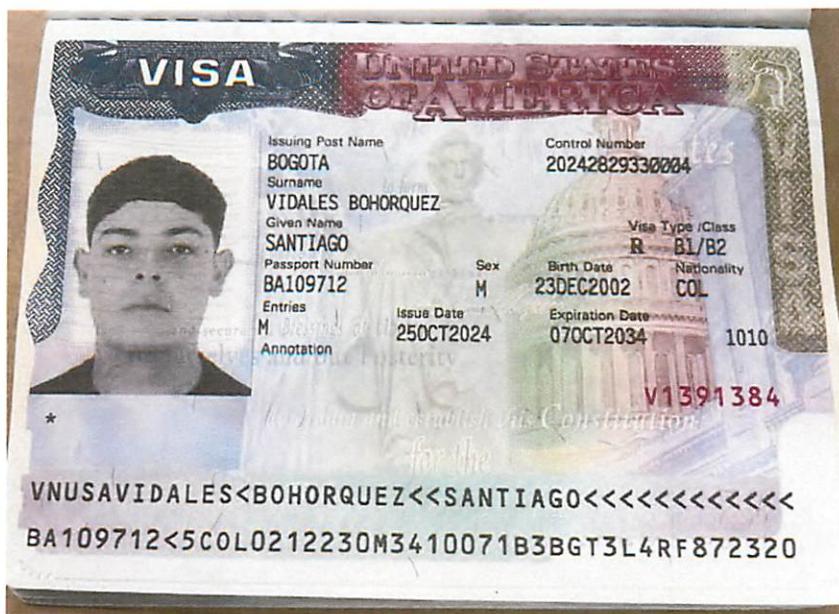
2. The facts and information contained in this affidavit are based upon my training and experience, participation in this investigation, personal knowledge and observations during this investigation, as well as the observations of other agents and police officers involved in this investigation. All observations not personally made by me were relayed to me by the individuals who made them or are based on my review of records, documents, and other physical evidence obtained during the investigation.

3. This affidavit contains information necessary to support probable cause. It is not intended to include each and every fact and matter observed by me or known to the United States. This affidavit contains information necessary to support probable cause for a criminal complaint charging Santiago VIDALES-BOHORQUEZ (“VIDALES-BOHORQUEZ”) with: Fraud or misuse of visa or other government document, in violation of 18 U.S.C. § 1546(a).

**PROBABLE CAUSE**

4. On or about March 27, 2025, at the Luis Muñoz Marin International Airport in Carolina, Puerto Rico, Mr. Santiago VIDALES-BOHORQUEZ, a citizen of Colombia, arrived in the United States from Bogotá, Colombia, on board Avianca Airline flight number AV258.

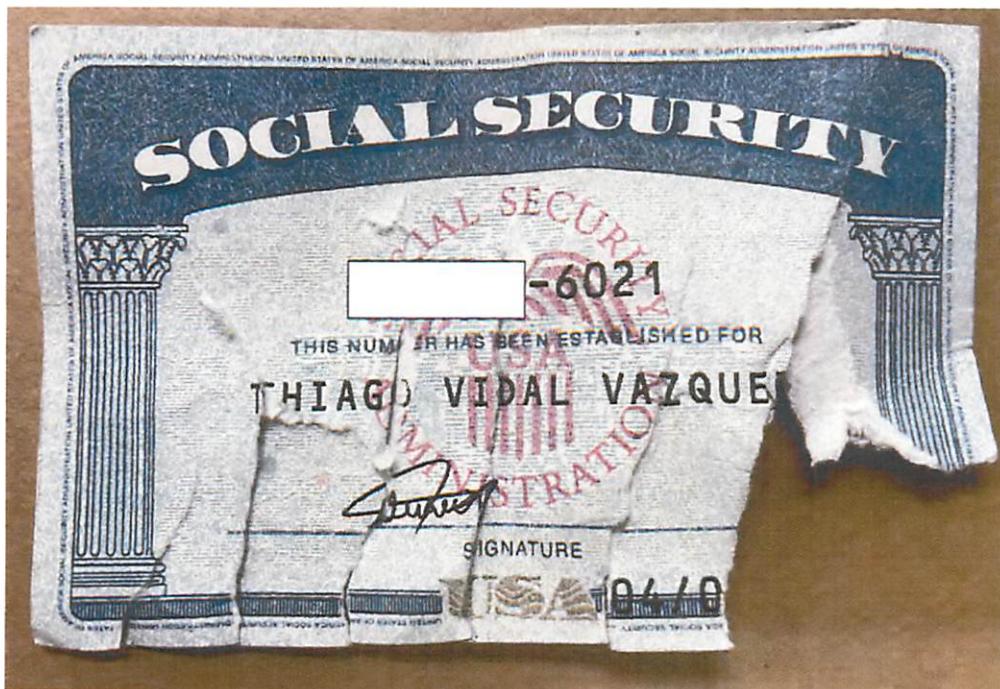
5. Upon arrival, the alien presented himself for inspection as a Colombian citizen by the name of Santiago VIDALES-BOHORQUEZ, and presented as identification his Colombian passport #BA109712, containing a U.S. Visa foil number V1391384 on page 6 of the passport. *See* the photographs of his valid Colombian passport and U.S. visa:



6. VIDALES-BOHORQUEZ claimed to be the rightful owner of all the documents presented, containing his photo and issued under the name of Santiago VIDALES-BOHORQUEZ.

7. During his Primary inspection process, VIDALES-BOHORQUEZ stated that he “worked in the United States.” Since VIDALES-BOHORQUEZ only has a B1/B2 visa, he is not legally allowed to work in the United States. Accordingly, he was referred for a more thorough inspection.

8. During his Immigration and Customs inspection, a United States Permanent Resident card ("LPR Card") with Alien number 069-635-208, containing the photograph of VIDALES-BOHORQUEZ and a partially crumpled/ripped Social Security card ("SS Card") bearing number XXX-XX-6021, were found in his possession. *See* the below photographs of the LPR Card and SS Card found in VIDALES-BOHORQUEZ's person:



9. Both documents found in his possession—the LPR Card and the SS Card— were issued under the name of Thiago VIDAL-VAZQUEZ, which is different from the subject's real name.

10. The Alien number 069-635-208 was queried thru the Immigration database systems, which revealed a match to a woman born in the Dominican Republic.

11. During this process VIDALES-BOHORQUEZ fingerprints were submitted to the FBI for examination and comparison, this examination disclosed no match to any criminal record.

12. VIDALES-BOHORQUEZ was read his Mirand rights, and he did not waive his right to remain silent. Thereafter, VIDALES-BOHORQUEZ had an outburst of crying and nervousness, and he cried out loud that he obtained the documents from an unknown man, so he can work in the United States.

13. VIDALES-BOHORQUEZ is a citizen of Colombia that attempted to enter the United States and he has no legal document or permit that allowed him to work or reside in the United States.

14. VIDALES-BOHORQUEZ was attempting to enter the United States and was found in possession of documents knowing it to be forged, counterfeited, altered, or falsely made, or to have been procured by means of any false claim or statement, or to have been otherwise procured by fraud or unlawfully obtained, all in violation of Title 18, section 1546 (a).

### CONCLUSION

15. Based upon my training, experience, and my participation in this investigation, I believe that probable cause exists that Santiago VIDALES-BOHORQUEZ attempted to enter the United States in violation of 18 U.S.C. § 1546 (a).

Respectfully submitted,

Juan E. Batista-Aybar  
Enforcement Officer  
Homeland Security Investigations

Sworn in accordance with the requirement of Fed. R. Crim. P. 4.1. by telephone at 1:19PM  
on this 28th day of March 2025, in San Juan, Puerto Rico.

  
\_\_\_\_\_  
HON. MARSHAL D. MORGAN  
UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF PUERTO RICO